

Kristi Cahoon Kelly

From: Kristi Cahoon Kelly
Sent: Thursday, February 09, 2012 5:03 PM
To: 'George Kostel'
Cc: 'Leonard Bennett'; Susan Rotkis; Scott Surovell
Subject: Berrios- Protective Order and Proposed Order Regarding Discovery
Attachments: Protective Order Berrios.DOC; Consent Order Regarding Discovery_ Berrios.doc

Mr. Kostel,

Please see the attached proposed protective order and agreed order regarding discovery.

Please let me know if the protective order is acceptable to you. If so, I will sign and send you a copy for submission to the court.

Regarding the order, I believe I have adequately summarized our meet and confer telephone call this morning in the proposed order. Since you indicated that you were going to supplement the majority of your responses where you reference the loan file and regarding the credit disputes, I assumed that means you intended to withdraw your objections, which is why the order reflects that. If you do not intend to withdraw your objections to the responses/answers you will supplement, please let me know so I can file an appropriate motion to compel with the court.

Thank you for your cooperation.

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

SANDRA J. BERRIOS,
Plaintiff,

v.

EXPERIAN INFORMATION SOLUTIONS,
INC., *et al.*
Defendants.

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) Civil Action No. 1:11-cv-01130
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AGREED ORDER

Pursuant to the agreement of between the Plaintiff, Sandra Berrios, and remaining Defendant, Flagstar Bank, FSB, the parties represent they have reached an agreement regarding the Defendant's responses and objections to the Plaintiff's discovery requests as follows:

Plaintiff has agreed to enlarge the time for the Defendant to respond to her Requests for Production of Documents ("Requests") and Interrogatories to February 17, 2012;

Plaintiff has agreed to enlarge the time for the Defendant to produce a privilege log to February 17, 2012;

Plaintiff and Defendant will file a Joint Motion for Entry of a Protective Order on or before February 15, 2012;

Defendant will produce responses to the Plaintiff's Requests Nos. 7, 10, 11 & 21 and Interrogatory Nos. 1, 2, 7, 8, 10 & 14 upon entry of the protective order;

Defendant will supplement its document production to Requests Nos. 1-6, 8, 12-19, & 22-27 and answers to Interrogatory Nos. 3-6, 9, 11-13, 15-18, & 20-22;

Defendant will produce a "cheat sheet" of codes responsive to Request No. 20;

Plaintiff agrees to narrow the scope of Interrogatory No. 17 so that the Defendant does not have to provide information on settlements, if a case was settled;

Plaintiff agrees to withdraw Requests No. 27;

Plaintiff has narrowed the scope of Interrogatory No. 19 and Requests No. 28 so that the Defendant will only produce documents related to those employees who processed the Plaintiff's ACDVs; and

By agreement the Defendant withdraws the objections to Requests and Interrogatories that they agree to produce/answer subject to a protective order and supplement their responses/production as indicated above.

Accordingly, pursuant to the agreement of the Plaintiff and Defendant, and for good cause shown, it is hereby ADJUDGED, ORDERED, and DECREED that:

The Defendant shall have an enlargement until February 17, 2012 to produce its privilege log and respond to the Plaintiff's Requests and Interrogatories as indicated above.

The Clerk is directed to send certified copies of this Order to all counsel of record.

IT IS SO ORDERED:

Dated: February __, 2012

United States District Judge

WE ASK FOR THIS:

By: _____
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